

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

SARAH LYNN MALONE

Plaintiff,

v.

STRATEGIC LIMITED PARTNERS, LP and  
ROY ANDLING

Defendants.

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)

) Supreme Court of the State of

) New York County of Rensselaer

) Case No. 2024 \_\_\_\_\_

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**1:24-cv-00397 (GTS/CFH)**

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**NOTICE OF REMOVAL**

**TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF NEW YORK**

**PLEASE TAKE NOTICE**, Defendants, STRATEGIC LIMITED PARTNERS, LP and ROY ANDLING, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, hereby remove this civil action from the Supreme Court of the State of New York County of Rensselaer, Third Judicial District, to the United States District Court for the Northern District of New York. In support of this Notice of Removal, Defendants state as follows:

1. On February 13, 2024, SARAH LYNN MALONE, filed an action in the Supreme Court of the State of New York County of Rensselaer. A true and correct copy of the Complaint at Law is attached hereto as **Exhibit “A”**. This notice is filed within 30 days of service, which was first notice of the pleading pursuant to 28 U.S.C. § 1446.

2. Plaintiff’s Complaint at Law action alleges violations of The Telephone Consumer Protection Act 47 USC § 227. Therefore, there is Federal Question Jurisdiction.

3. As required by 28 U.S.C. § 1446(d), this Notice of Removal will be served upon all parties of record and will be filed with the Supreme Court of the State of New York County of Rensselaer.

4. All attorneys for Defendants, STRATEGIC LIMITED PARTNERS, LP and ROY ANDLING, agree and consent to removal of this action from the Supreme Court of the State of New York County of Rensselaer, Third Judicial District, to the United States District Court for the Northern District of New York.

5. The United States District Court for the Northern District of New York, is the District Court that should receive this matter pursuant to 28 U.S.C. § 112(a).

6. Pursuant to the requirements of 28 U.S.C. § 1446(a), the pleadings filed in the Rensselaer County action have been filed herewith this Notice of Removal.

**WHEREFORE**, Defendants, STRATEGIC LIMITED PARTNERS, LP and ROY ANDLING, do hereby give notice of removal of this action to the United States District Court for the Northern District of New York.

**DEFENDANTS DEMAND TRIAL BY JURY**

Dated: Carle Place, New York  
March 21, 2024

Respectfully submitted,

**s/ Gina M. Arnedos**

Gina M. Arnedos Bar Number: 2416725

*Attorneys for Defendants*

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WCM File No.: 5700.16136

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